

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CHEVRON CORPORATION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	11 Civ. 0691 (LAK)
	:	
STEVEN DONZIGER, et al.,	:	
	:	
Defendants.	:	
-----	x	

**DECLARATION OF ANNE CHAMPION
IN SUPPORT OF CHEVRON CORPORATION'S LIMITED OBJECTIONS TO
MAGISTRATE JUDGE LEHRBURGER'S REPORT AND RECOMMENDATION
REGARDING CHEVRON CORPORATION'S MOTION TO HOLD
AARON MARR PAGE AND FORUM NOBIS PLLC IN CONTEMPT OF COURT
FOR THEIR VIOLATION OF THE RICO AND DEFAULT JUDGMENTS**

I, ANNE CHAMPION, hereby declare under penalty of perjury pursuant to 28 U.S.C.
§ 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of New York and before this Court. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, and counsel for Chevron Corporation ("Chevron") in this matter. I make this declaration, based on personal knowledge, in support of Chevron Corporation's Limited Objections to Magistrate Judge Lehrburger's Report and Recommendation Regarding Chevron Corporation's Motion to Hold Aaron Marr Page and Forum Nobis PLLC In Contempt Of Court For Their Violation Of The RICO And Default Judgments. If called as a witness, I could and would testify competently as to the content of this declaration.

2. Attached hereto as **Exhibit A** is a true and correct copy of a transcript of the January 16, 2020 hearing held before Magistrate Judge Lehrburger regarding Chevron's Motion

To Hold Aaron Marr Page and Forum Nobis PLLC In Contempt Of Court For Their Violation Of The RICO And Default Judgments (the “January 16, 2020 hearing”).

3. Attached hereto as **Exhibit B** is a true and correct copy of an Engagement Letter between Aaron Marr Page and Steven Donziger, dated March 10, 2010, produced by Aaron Marr Page, bearing bates number AMPagePJD_0009557 – AMPagePJD_0009559, and admitted into evidence at the January 16, 2020 hearing as Plaintiff’s Exhibit 9100.

4. Attached hereto as **Exhibit C** is a true and correct copy of an Engagement Letter between Aaron Marr Page and Steven Donziger, dated January 10, 2011, produced by Aaron Marr Page, bearing bates number AMPagePJD_0009560 – AMPagePJD_0009562, and admitted into evidence at the January 16, 2020 hearing as Plaintiff’s Exhibit 9101.

5. Attached hereto as **Exhibit D** is a true and correct copy of an Email thread between Aaron Marr Page and Steven Donziger with the subject line “RE: draft contract/Ecuador”, dated January 13, 2017, produced by Aaron Marr Page, bearing bates number AMPagePJD_0010864 – AMPagePJD_0010865, and admitted into evidence at the January 16, 2020 hearing as Plaintiff’s Exhibit 9109.

6. Attached hereto as **Exhibit E** is a true and correct copy of an Ecuador Judgment Investment Agreement between the Frente de Defensa de la Amazonia (“FDA”) and Roger Waters (“Funder”), dated January 31, 2017, produced by Aaron Marr Page, bearing bates number AMPagePJD_0009214 – AMPagePJD_0009221, and admitted into evidence at the January 16, 2020 hearing as Plaintiff’s Exhibit 9113.

7. Attached hereto as **Exhibit F** is a true and correct copy of a Promissory Note between Steven Donziger and Roger Waters, dated January 22, 2016, Produced by Mary K.

Sullivan, bearing bates number MKS-0002713 – MKS-0002717, and admitted into evidence at the January 16, 2020 hearing as Plaintiff's Exhibit 9115.

8. Attached hereto as **Exhibit G** is a true and correct copy of a Letter from Aaron Marr Page to Frank Libby with the subject line "Acknowledgment of receipt: FDA-related materials, documents. and funds", dated May 2, 2018, produced by Aaron Marr Page, bearing bates number AMPagePJD_0008674 – AMPagePJD_0008676, and admitted into evidence at the January 16, 2020 hearing as Plaintiff Exhibit 9118.

9. Attached hereto as **Exhibit H** is a true and correct copy of an Email thread between Aaron Marr Page and Steven Donziger with the subject line "Email Memorandum re FDA Funds received from Katie Sullivan", dated May 7, 2018, produced by Aaron Marr Page, bearing bates number AMPagePJD_0004437 – AMPagePJD_0004438, and admitted into evidence at the January 16, 2020 hearing as Plaintiff's Exhibit 9119.

10. Attached hereto as **Exhibit I** is a true and correct copy of a demonstrative chart, admitted into evidence at the January 16, 2020 hearing as Plaintiff's Exhibit 9135.

11. Attached hereto as **Exhibit J** is a true and correct copy of a chart showing Transfers from George R. Waters to Steven Donziger, admitted into evidence at the January 16, 2020 hearing as Plaintiff's Exhibit 9137.

12. Attached hereto as **Exhibit K** is a true and correct copy of excerpts from the deposition of Aaron Marr Page held on April 18, 2019. These excerpts were admitted into evidence at the January 16, 2020 hearing.

13. Attached hereto as **Exhibit L** is a true and correct copy of an excerpt from the October 28, 2019 New York state bar attorney disciplinary hearing for Steven Donziger, styled In The Matter of Steven Donziger, RP#2018.7008, and currently pending before the Departmental

Disciplinary Committee of the Appellate Division, First Department. The excerpt was admitted into evidence at the January 16, 2020 hearing.

Executed on this 10th day of February, 2020 at New York, New York.

/s/ Anne Champion
Anne Champion